

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
v.)
)
ROMAN VALDMA,)
Defendant.)

Criminal No. 03-882-MBB

**ASSENTED TO MOTION TO MODIFY CONDITIONS OF RELEASE
BY EXPANDING TRAVEL RESTRICTIONS**

The Defendant, Roman Valdma ("Valdma"), requests modification of his condition of release by expanding travel to the six New England states. As grounds therefor, Valdma states the following:

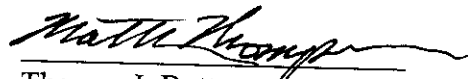
1. On August 5, 2003, Valdma was arrested under a warrant issued upon Complaint. The Complaint alleged that Valdma committed visa fraud in violation of 18 U.S.C. § 1546(a).
2. The time for indictment in this matter was originally extended until October 29, 2003. Valdma has assented to the government's request that the Court further extend the time for indictment until December 3, 2003.
3. On August 8, 2003, the Court issued an Order Setting Conditions of Release (the "Order"). The Order included a condition restricting Valdma's travel to the Commonwealth of Massachusetts.
4. By this motion, Valdma requests modification of the Order expanding travel to the six New England states.

5. Under the circumstances of this case, there is no significant risk of flight. Valdma was released on a \$250,000 appearance bond secured by a \$50,000 mortgage on his home, located at 2 La Rose Place, Unit 25, Boston, Massachusetts. In addition, the Court recently allowed Valdma to travel to Florida for a period of five days. Valdma returned to Massachusetts without incident and within the time period set by the Court.

6. Counsel for the government, Ms. West, assents to the allowance of this motion.

WHEREFORE, Valdma respectfully requests the Court allow his motion.


ROMAN VALDMA
By his attorneys


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Dated: October 23, 2003

CERTIFICATE OF SERVICE

I hereby certify that the above-referenced document was served upon Kimberly P. West and Emily R. Schulman, Assistant United States Attorneys, United States Attorney's Office, One Courthouse Way, Boston, Massachusetts, 02210, by first-class mail, postage prepaid, on this date.


Matthew D. Thompson